

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY)	
UTILITIES COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY FOR)	CASE NO.
THE CONSTRUCTION OF A COMBINED CYCLE)	2014-00002
COMBUSTION TURBINE AT THE GREEN RIVER)	
GENERATING STATION AND A SOLAR)	
PHOTOVOLTAIC FACILITY AT THE E. W. BROWN)	
GENERATING STATION)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company and Kentucky Utilities Company (collectively "the Companies"), pursuant to 807 KAR 5:001, are to file with the Commission an original paper copy and an electronic copy of the following information, with a copy to all parties of record. The information requested herein is due no later than September 19, 2014. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Companies shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Companies fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to page 6 of the Supplemental Testimony of David S. Sinclair ("Sinclair Supplemental testimony"). It is stated that a new load forecast for the Brown Solar Facility is not needed, as the low load forecast submitted in this case is representative of the situation created by the departing municipalities. Provide the date by which the Companies plan to develop their next load forecast study.

2. Refer to page 7 of the Sinclair Supplemental Testimony. Lines 7-8 state that "Table 1 shows the Companies' forecasted reserve margin using the Low load scenario starting in 2019 to represent the reduction for the Departing Municipals' load."

a. Explain why the low load scenario was used in calculating the reserve margin instead of using the 2013 Load Forecast with the subtraction of the departing municipal load.

b. Provide a revised Table 1 which calculates reserve margin by subtracting the departing municipal load from the 2013 Load Forecast.

3. Refer to page 11 of the Sinclair Supplemental Testimony. Provide the details of the purchase power agreement referenced in lines 14-17.

4. Refer to page 13 of the Supplemental Sinclair Testimony, lines 20-22, which state that the revenue requirements of capital costs and operation and maintenance costs will be stable from year to year "in the early years of the project." Explain why the revenue requirements of these costs are not expected to be stable in the latter years of the project.

5. In light of the Companies' decision to withdraw the request for a certificate of public convenience and necessity to construct the proposed natural gas combined-cycle unit at the Green River Generating Station, has a decision been made regarding the 41 individuals currently employed at the Green River Generating Station? If so, how many employees will be reassigned and how many employees are expected to retire or receive a severance package? If not, when do the Companies anticipate making such a determination?



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DATED SEP 05 2014

cc: Parties of Record

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